

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ESTATE OF JORDAN BAKER, by and through administrator, JANET BAKER,)	No. 4:15-cv-3495
)	
Plaintiff,)	
)	
v.)	Judge Sim Lake
)	
JUVENTINO CASTRO, THE CITY OF HOUSTON, RPI MANAGEMENT COMPANY, LLC, and RPI INTERESTS I, LTD,)	
)	JURY TRIAL DEMANDED
)	
Defendants.)	

**PLAINTIFF'S FOURTH SET OF REQUESTS FOR PRODUCTION
TO DEFENDANTS CITY OF HOUSTON AND JUVENTINO CASTRO**

Plaintiff JANET BAKER, by her undersigned attorneys, propounds the following Requests for Production under Rule 34 of the Federal Rules of Civil Procedure on Defendants City of Houston and Juventino Castro, to be completed within thirty days after service hereof.

DEFINITIONS & INSTRUCTIONS

Plaintiff hereby expressly incorporates the definitions and instructions contained in Plaintiff's First Set of Interrogatories to the City of Houston, as well as any additional definitions and instructions contained in any of his prior discovery requests, if any.

REQUESTS FOR PRODUCTION

1. Any document that relates in any way to any arrest or prosecution in 2013-2014 related to any alleged robbery that occurred at or near any store, vehicle, parking lot, or person located at the mall at or about 5700 West Little York, Houston, TX, including but not limited to the arrests that are identified in the documents identified as pp. 208, 221-225 by Defendant City of Houston.

2. Any and all documents, including but not limited to any version of any

Exhibit E

Houston Police Department Information Bulletin, that were drafted in relation to any alleged robbery or pattern of robberies at or near 5700 West Little York, Houston, TX, at any time in 2013 or January 2014.

RESPECTFULLY SUBMITTED,

JANET BAKER

BY: /s/ Mark Loevy-Reyes
One of Plaintiff's Attorneys

Attorneys for Janet Baker

Arthur Loevy
Jon Loevy
David B. Owens
Mark Loevy-Reyes
LOEVY & LOEVY
311 N. Aberdeen St., 3rd Floor
Chicago, IL 60607
(312) 243-5900

Billy Joe Mills
FIRMEQUITY
858 West Armitage Avenue
Suite 101
Chicago, IL 60614
(847) 207-9064

CERTIFICATE OF SERVICE

I, Mark Loevy-Reyes, an attorney, hereby certify that on February 14, 2017, I served the foregoing Plaintiff's Fourth Set of Requests for Production to the City of Houston and Juventino Castro on all counsel of record via electronic mail.

/s/ Mark Loevy-Reyes
One of Plaintiff's Attorneys